

# EXHIBIT B

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

LAURA PRESSLEY, ROBERT BAGWELL,  
TERESA SOLL, THOMAS L. KORKMAS,  
and MADELON HIGHSMITH,

*Plaintiffs*,

v.

Civil Action No. 1:24-cv-00318-DII

JANE NELSON, in her official capacity as the  
Texas Secretary of State, CHRISTINA  
ADKINS, in her official capacity as the  
Director of the Elections Division of the  
Texas Secretary of State, BRIDGETTE  
ESCOBEDO, in her official capacity as  
Williamson County Elections Administrator,  
DESI ROBERTS, in his official capacity as  
Bell County Elections Administrator, and  
ANDREA WILSON, in her official capacity as  
Llano County Elections Administrator,

*Defendants*,

**DECLARATION OF DESI ROBERTS**

I, Desi Roberts, have personal knowledge or knowledge based on my review of business records of Bell County, of all statements below. I hereby make the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Desi Roberts. I am at least 18 years old, of sound mind, and competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. I have served as the Bell County Elections Administrator since June 1, 2022. As the Bell County Elections Administrator, I oversee, direct, and administer elections and the processing and maintenance of election equipment for Bell County. I oversee the tabulation of election results using Elections Systems & Software (ES&S) and high-speed scanners, and the release results to the public and media. I manage and lead division supervisors, leadership teams and staff in short and long-term goal-setting and strategic planning in the areas of voter registration, warehouse and facility management, voting systems, financial and operational services, and community services.

Further, I am responsible for ensuring compliance with state laws, the Texas Elections Code, Texas Secretary of State Election Division Guidance and Directives, Advisories for the Bell County Commissioners Court, Elections Commission and the Elections Board.

3. On August 20, 2024, the Bell County Election Board, of which I am the chair and which has general supervisory authority for the procurement of election supplies met and unanimously voted to discontinue the use of computer generated numbering of ballots and to procure pre-printed, sequentially numbered paper ballots for the November 2024 election. *See Exhibit 1.* The use of consecutively numbered ballots has been adopted by Bell County as a permanent change for all future elections.

4. On June 24, 2024, the Texas Secretary of State issued Election Advisory No. 2024-21, which directed county election officials to discontinue the use of computer-generated numbering of ballots by e-pollbooks. *See Exhibit 2.* The Texas Secretary of State also issued new certification standards for electronic pollbooks, applicable to the type of voting system used by Williamson County, that prohibits Williamson County from using e-pollbooks to generate ballot numbers. *See Exhibit C, Texas Secretary of State, Texas Electronic Pollbook Functional Standards at 7, Functional Standard 5, June 24, 2024.*

5. As the Bell County Elections Administrator, it is my policy and practice to comply with all directives from the Secretary of State—to follow all Secretary of State Election Advisories and Certification Standards. The Bell County Election Administrator has no ability to alter or supersede state law as interpreted by the Secretary of State in its Advisory Opinions and Texas Electronic Pollbook Functional Standards. Further, it is my interpretation of state law that Bell County is bound by Secretary of State Election Advisory No. 2024-21 and the Texas Electronic Pollbook Functional Standards issued on June 24, 2024, and that as the Bell County Elections Administrator, I lack the discretion, under state law, to deviate from Secretary of State Advisory No. 2024-21 and Texas Electronic Pollbook Functional Standards.

6. Since the Secretary of State issued these directives on June 24, 2024, the current Bell County policy and practice is to use voting machines that do not permit the computer-generated numbering of ballots by e-pollbooks. Bell County has instituted a permanent policy change based on state law as directed by the Secretary of State. And, based on the Secretary of State's directives, there is no reasonable expectation that Bell County will reinstitute the use of e-pollbooks that generate ballot numbers.

7. Consistent with the change implemented for the November 2024 election, Bell County is presently preparing for the May 3, 2025, election by using consecutively numbered ballots; Bell County is not utilizing e-pollbooks to randomly generate numbers on ballots.

8. Bell County did not institute these policy changes as a result of this litigation, but

because of the new directives from the Secretary of State, namely, Elections Advisory NO. 2024-21 (Update Ballot Numbering Requirement) dated June 24, 2024. Consecutive numbering of the ballots is the only other method allowed by the Election Code of which my office is aware.

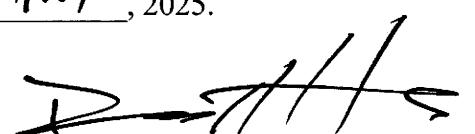
9. Laura Pressley has alleged in her lawsuit against Bell County and others that she was able to violate the ballot secrecy of 60,000 Williamson County voters through the use of an algorithm. I have no knowledge of this violation of ballot secrecy and no knowledge of how it could have been conceivably accomplished.

10. Bell County is not in possession of any voter ballot data that reveals individual voter selections to county employees or any other person. I have no knowledge of any algorithm—or any other method—to match voters' identities to their ballots. I have never observed any data that would allow anyone to match voters' identities to their ballots.

11. The ExpressLink software is not connected to the internet; the parameters are set before it is deployed to the polling site, and it operates independently of any internal or external network connection that might exist on the e-pollbook itself. Even if the e-pollbook is completely disconnected from network connections, it still allows the check-in to print the proper ballot style. Currently, in accordance with Section 31.014, pre-printed serial number ranges are printed and used for all ballots. In line with Section 62.009, the election worker disarranged a supply of ballots, face down on a table, to conceal the numbering. Following Section 64.001, the voter selects their ballot for voting.

My name is Desi Roberts. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Bell County, Texas on 22 April, 2025.



Desi Roberts, Declarant